

Conclusion:

Although one may argue this communication was Internet Volunteer Activity, it falls under the exception to that rule. The advertisement was placed in a location used for paid advertising, similar to other candidates. Further, the Candidate's advertisement stated that it was paid for by the Candidate's Committee. These two facts demonstrate this was a public communication subject to disclosure requirements.

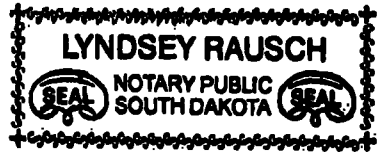
Since this public communication must be disclosed, the Third Quarter 2017 Report should have it listed as a disbursement paid by the Committee or an in-kind attributed to Pat Powers if the aggregate exceeded \$200.00. Fair market value, as we have seen from other committees advertising on this website, would put this expenditure over \$200.00.

Due to the Committee failing to disclose this disbursement for advertising, there has either been an undisclosed in-kind contribution or an undisclosed public communication disbursement. Either way, there has been a clear violation of the Code of Federal Regulations.

I appreciate your attention and thank you for your consideration in this matter.

Lora Hubbel

Lora Hubbel



Expires 01/27/2022






Signed and sworn to before me this 26 day of January, 2018

Lyndsey Rausch

Enclosures: *Printscreens of Oct 5, 2017 and Jan 25, 2018 of dakotawarcollege.com*

Continued until Jan 25, 2018

14137 unredd | South Dakota War Coll | ddotawarcollege.com












Let's Add to Governor Kristi Noem's 2018 List of the South Dakota

Thank You

KRISTI NOEM for Governor

Dusty Johnson

14137 unredd | South Dakota War Coll | ddotawarcollege.com

Support the SDWC

Subscribe to the SDWC Daily Digest

Email Address *

First Name

KRISTI NOEM for Governor

Kristi Campaign Finance

Noem Refreshes Corporate Contributions, Announces Campaign Finance Reform Proposal



Noem leads by example in fight to restore integrity and transparency in SD politics

Sioux Falls, S.D. — Citing the need to restore transparency and integrity in the South Dakota electoral process, Rep. Kristi Noem today announced her campaign has not and will not accept corporate contributions nor will the campaign take funds from Political Action Committees that were established with the intent to circumvent individual contribution limits. Click to view Noem's campaign finance agenda.

"Current campaign finance laws in South Dakota contain loopholes that could allow corporations and individuals to charter campaign contribution limitations," said Noem. "While reforms are needed to address these problems, I will not wait to act until the campaign finance laws catch up to what's right. I will lead by example. And if elected as your governor, I will work with the legislature to close these loopholes. If we are going to change the culture of South Dakota politics, we need to set a standard of genuine accountability from the very beginning."

KRISTI NOEM'S CAMPAIGN FINANCE AGENDA

Ban corporate contributions. Big money in politics often leads to bigger government, conflicts of interest and potentially scandal. I will lead from the front on this issue. While corporate contributions became legal in South Dakota in 2017, I have and will not accept them. If elected Governor, I will work to ensure...

180444440001